



June 21, 2021

Client Services and Permissions Branch  
135 St. Clair Ave W  
Toronto ON M4V 1P5

**Re: Renewal of Permit to Take Water No. 3716-8UZMCU (Ministry Reference number 6476-AMMS2Q) for water bottling purposes**

The Grand River Conservation Authority (GRCA) has reviewed the report:

- Nestle Waters Canada – Erin; Technical Study for Permit to Take Water Renewal Application, prepared by Golder Associates et al., June 2019

and is providing the following comments in response to Notification of Application for Permit to Take Water dated May 5, 2020.

**Key Comments:**

- The GRCA supports the collaboration between the City of Guelph and Nestle Waters Canada to utilize the Guelph-Guelph/Eramosa Tier 3 numerical groundwater flow model for the current Triton Permit to Take Water renewal.
- The GRCA encourages and supports the continued use of numerical models developed for the Source Protection Program for Permit to Take Water applications.
- Triton Water Canada Holdings Inc. (Triton Water Canada) is encouraged to voluntarily reduce their pumping based on actual water use instead of maximum permitted to have a greater impact during low water conditions and to continue the commitment to drought management shown by Nestle Waters Canada by continuing their participation on the Grand River Low Water Response Team.
- As monitoring data are reviewed by the province, the MECP should ensure that discharges to watercourses that support cold water species are not affected by this water taking and that the hydrologic function of nearby provincially significant wetlands is maintained.

**Source Water Protection**

The subject well (TW1-88) is located in the headwaters of the Eramosa River watershed less than a kilometer from the border with the Credit River watershed. This taking is within the IPZ-Q (Intake Protection Zone for Quantity) for the City of Guelph Eramosa River Intake that was

assigned a significant risk level due to interconnection with municipal groundwater takings near to the intake in WHPA-Q (Wellhead Protection Area for Quantity) for the Guelph-Guelph/Eramosa area. The WHPA-Q was assigned a significant risk level as a result of the Tier 3 Water Budget and Risk Assessment study (Tier 3 Study).

A significant risk level means that all consumptive water takings within the IPZ-Q are classified as significant drinking water threats, which mandate the development of water quantity policies to be included in the Grand River Source Protection Plan. Water quantity policy development addressing consumptive water takings and recharge reduction activities is currently in process.

The results of this Tier 3 Study have been accepted by the Lake Erie Region Source Protection Committee and the Ministry of the Environment, Conservation and Parks. However, with policy development still in process, the Tier 3 Study results and policies have not yet been included in the Grand River Source Protection Plan and are not in legal effect.

Where numerical models developed through the Source Protection Program can be reasonably modified or updated such that they meet the technical expectations and requirements, the GRCA continues to encourage and support the use of these models for assessing Permit to Take Water applications.

### **Low Water**

The Eramosa River watershed is affected by drought periodically. Because the watercourses in this watershed are dependent on groundwater for baseflow, it is important that all water takings, including deep groundwater takings, reduce pumping rates during drought periods.

The current permit has conditions regarding the Ontario Low Water Response program with a mandatory reduction in takings based on the maximum permitted taking for each declared low water level. Triton Water Canada is encouraged to voluntarily reduce their pumping based on actual water use instead of maximum permitted to have a greater impact during low water conditions and to continue the commitment to drought management shown by Nestle Waters Canada by continuing their participation on the Grand River Low Water Response Team.

### **Natural Heritage**

The property is adjacent to provincially significant Speed Lutteral Swan Creek Wetland Complex. Changes to water levels can greatly affect the function of the wetland complex. GRCA recommends that Triton Water Canada review the monitoring data collected over the period of the current permit and take any necessary action to ensure the hydrologic function of the wetland is not impacted.

## Monitoring Program

The proposed changes to the monitoring program would benefit from additional supporting information made readily available. This could include the original intent of the monitoring locations that are proposed to be removed, well logs, and hydrographs such that the proposed changes can be fully reviewed.

The Ministry should consider the above comments and ensure appropriate terms and conditions are included in the renewed PTTW.

Sincerely,

A handwritten signature in black ink, appearing to read 'Stephanie Shifflett', written in a cursive style.

Stephanie Shifflett, P.Eng  
Water Resource Engineer  
Grand River Conservation Authority

Cc: Dwight Boyd, P.Eng Director of Engineering, GRCA  
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